

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>No. 25-cr-20032-JTF</b>
	)	
<b>vs.</b>	)	
	)	
<b>SANJEEV KUMAR,</b>	)	
	)	
<b>Defendant.</b>	)	

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**MOTION FOR A PROTECTIVE ORDER**

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Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States hereby moves this Court for entry of a Protective Order that will ensure the confidentiality of any information that would tend to identify non-parties, witnesses, or victims included within the discovery and evidence in this case.

Entry of a protective order restricting the use, dissemination, and disposition of material containing any information, including protected health and personal identifying information, that tends to identify non-parties, witnesses, or victims is essential to permit the United States to provide complete discovery to the Defendant while protecting the identity and privacy of the non-parties, witnesses, or victims.

The United States respectfully requests that the Court order that the discovery and disclosure of the unredacted materials be subject to the following conditions and restrictions:

- 1) the unredacted materials provided are for the sole use of counsel in preparing for the defense of this case<sup>1</sup> and shall not be copied, reproduced or otherwise disseminated to

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<sup>1</sup> “[U]se of counsel in preparing the defense of this case” contemplates and permits dissemination to the defense team, including counsel’s staff, experts, consultants, interpreters, and

third parties, or used for any other purpose, except that counsel may provide a copy to Defendant under the same conditions and that redacted materials—removing protected health and personal identifying information—may be shown to witnesses in preparation for trial; and

- 2) notwithstanding any ethical rules governing file preservation, retention and destruction, counsel and Defendant are required to destroy the audio recordings within 45 days of the conclusion of this case<sup>2</sup> or to return all such materials to counsel for the United States.

Counsel for the United States has consulted with Maritsa Flaherty, counsel for the Defendant, about the terms of the protective order, and the above language represents the agreement of the parties.

Respectfully submitted,

REAGAN TAYLOR FONDREN  
Acting United States Attorney

By: /s/ Lynn Crum  
Lynn Crum  
Assistant U.S. Attorney  
United States Attorney's Office, WDTN

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other parties contracted with counsel for the defense of this case. Counsel should be required to take all reasonable steps to ensure that persons receiving such identifying information do not use or disclose any such information for any purpose other than for use in this case.

<sup>2</sup> The case should be deemed concluded after all trial and appellate proceedings or upon the expiration of the time to commence any further proceedings.

**CERTIFICATE OF SERVICE**

I, Lynn Crum, Assistant United States Attorney for the Western District of Tennessee, hereby certify that a copy of the foregoing pleading was forwarded by electronic means via the court's electronic filing system to counsel for the defendant.

This the 20<sup>th</sup> day of March, 2025.

/s/ Lynn Crum  
Lynn Crum  
Assistant United States Attorney